

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MYUN-UK CHOI, JIN-HO JUNG, SUNG-
HUN JUNG, SUNG-HEE LEE, and KYUNG-
SUB LEE, Individually and on Behalf of All
Others Similarly Situated,

Case No.: 14-cv-9912 (KMW)

Plaintiff,

**ORAL ARGUMENT
REQUESTED**

vs.

TOWER RESEARCH CAPITAL LLC and
MARK GORTON,

Defendants.

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Tower's and Gorton's Motion to Dismiss the Complaint, and the Declaration of Robert W. Trenchard, dated February 27, 2015, and exhibits thereto, Defendants in the above-captioned proceedings, by their attorneys, will move before the Honorable Kimba M. Wood, United States District Judge, of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6), dismissing with prejudice all claims in Plaintiffs' Complaint.

Dated: February 27, 2015

Respectfully submitted,

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

By: /s Robert W. Trenchard
Robert W. Trenchard
Jason D. Hirsch
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: (212) 230-8867
Facsimile: (212) 230-8800
robert.trenchard@wilmerhale.com
jason.hirsch@wilmerhale.com

Matthew T. Martens
Matthew L. Beville
1875 Pennsylvania Avenue
Washington, DC 20006
Telephone: (202) 663-6921
Facsimile: (202) 663-6363
matthew.martens@wilmerhale.com
matthew.beville@wilmerhale.com

***Attorneys for Defendants Tower Research
Capital LLC and Mark Gorton***